

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)**

IN RE: TITANIUM DIOXIDE ANTITRUST
LITIGATION

Master Docket No. 10-CV-00318(RDB)

THIS DOCUMENT RELATES TO:
All Actions

**[PROPOSED] ORDER STAYING ALL PROCEEDINGS AS AMONG PLAINTIFFS
HALEY PAINT COMPANY, ISAAC INDUSTRIES, INC., AND EAST COAST
COLORANTS, LLC D/B/A BREEN COLOR CONCENTRATES, ON BEHALF OF
THEMSELVES AND THE CERTIFIED CLASS, AND DEFENDANTS E. I. DU PONT
DE NEMOURS AND COMPANY AND HUNTSMAN INTERNATIONAL LLC ONLY**

WHEREAS, Plaintiffs Haley Paint Company, Isaac Industries, Inc., and East Coast Colorants, LLC d/b/a Breen Color Concentrates (collectively, "Plaintiffs") brought the above-captioned action, as representatives of a class of direct purchasers of titanium dioxide in the United States, against various defendants including Huntsman International LLC ("Huntsman") and E. I. du Pont de Nemours and Company ("DuPont");

WHEREAS, by Order dated August 28, 2012, the Court certified a class of direct purchasers of titanium dioxide in the United States (collectively, "the Class");

WHEREAS, on July 15, 2013, Plaintiffs, on behalf of themselves and the Class, and Huntsman reached an agreement for the settlement and release of all class claims in this litigation, as against Huntsman only, subject to notice to the Class and completion of the approval process before this Court pursuant to Rule 23(e) of the Federal Rules of Civil procedure, and on that basis by letter dated July 15, 2013 sought a stay of all proceedings as between them as of that date;

WHEREAS, on July 26, 2013, Plaintiffs, on behalf of themselves and the Class, and DuPont reached an agreement in principle for the settlement and release of all class claims in this litigation, as against DuPont only, subject to finalizing the settlement documentation, notice to the Class and completion of the approval process before this Court pursuant to Rule 23(e) of the Federal Rules of Civil procedure, and on that basis by letter dated July 26, 2013 sought a stay of all proceedings as between them as of that date;

NOW THEREFORE, it is ordered:

1. All proceedings in this litigation, including but not limited to all motion practice of any kind, as between or on behalf of Plaintiffs, the Class and Huntsman as of July 15, 2013, are hereby stayed pending further order of the Court, except for proceedings provided for in, or necessary to effectuate, the settlement agreement(s) between those parties; and
2. All proceedings in this litigation, including but not limited to all motion practice of any kind, as between or on behalf of Plaintiffs, the Class and DuPont as of July 26, 2013, are hereby stayed pending further order of the Court, except for proceedings provided for in, or necessary to effectuate, the settlement agreement(s) between those parties.

SO ORDERED this ____ day of August, 2013.

HONORABLE RICHARD D. BENNETT
UNITED STATES DISTRICT JUDGE

Dated: August 5, 2013

by Solomon B. Cera / TGC.
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